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*Attorneys for Plaintiff Pebble Limited Partnership*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA**

PEBBLE LIMITED PARTNERSHIP,

Plaintiff,

vs.

ENVIRONMENTAL PROTECTION  
AGENCY, *et al.*,

Defendants.

**PLAINTIFF'S MOTION TO  
COMPEL RESPONSES TO THIRD-  
PARTY SUBPOENAS UNDER  
FED. R. CIV. P. 45 TO ALASKA  
CONSERVATION FOUNDATION,  
SAM SNYDER, BRISTOL BAY  
REGIONAL SEAFOOD  
DEVELOPMENT ASSOCIATION,  
AND ROBERT WALDROP**

**CIVIL ACTION NO.  
3:14-cv-00171-HRH**

Plaintiff Pebble Limited Partnership (“Pebble”), by and through its undersigned counsel, respectfully moves the Court, pursuant to Rules 37 and 45 of the Federal Rules of Civil Procedure and Local Rule 37.1, for an Order compelling non-party witnesses Bob Waldrop (“Waldrop”), the Bristol Bay Regional Seafood Development Association (“BBRSDA”), the Alaska Conservation Foundation (“ACF”), and Sam Snyder (“Snyder”) to produce within 30 days documents in response to Pebble’s subpoenas to them. For the reasons stated more fully in Pebble’s memorandum in support of this motion, including the exhibits attached thereto, all of which are submitted contemporaneously herewith and expressly incorporated herein by reference, the Court should compel these non-party witnesses to comply with Pebble’s subpoenas and should grant the relief requested by Pebble, as set forth fully in Pebble’s memorandum. A proposed order is attached.

Dated: September 8, 2015

Respectfully submitted,

/s/ Thomas Amodio

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MOTION TO COMPEL RESPONSES TO THIRD-PARTY SUBPOENAS UNDER FED. R. CIV. P. 45 TO ALASKA CONSERVATION FOUNDATION, SAM SNYDER, BRISTOL BAY REGIONAL SEAFOOD DEVELOPMENT ASSOCIATION, AND ROBERT WALDROP  
*Pebble Ltd. P’ship v. U.S. Env’tl. Prot. Agency, et al.*, Case No. 3:14-cv-00171-HRH  
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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA**

PEBBLE LIMITED PARTNERSHIP,

Plaintiff,

vs.

ENVIRONMENTAL PROTECTION  
AGENCY, *et al.*

Defendants.

**GOOD FAITH CERTIFICATE**

**CIVIL ACTION NO.  
3:14-cv-00171-HRH**

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MOTION TO COMPEL RESPONSES TO THIRD-PARTY SUBPOENAS UNDER FED. R.  
CIV. P. 45 TO ALASKA CONSERVATION FOUNDATION, SAM SNYDER, BRISTOL BAY  
REGIONAL SEAFOOD DEVELOPMENT ASSOCIATION, AND ROBERT WALDROP  
*Pebble Ltd. P'ship v. U.S. Env'tl. Prot. Agency, et al.*, Case No. 3:14-cv-00171-HRH  
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All counsel certify that they have conferred in good faith to resolve the issues in question and that it is necessary to file the following motion: Plaintiff's Motion to Compel Responses to Third-Party Subpoenas Under Fed. R. Civ. P. 45 to Alaska Conservation Foundation, Sam Snyder, Bristol Bay Regional Seafood Development Association, and Robert Waldrop.

The motion is opposed by the non-moving parties.

The parties agree that oppositions to the motion and any reply are to be served and filed as provided in D.AK. LR 7.1.

Dated: September 8, 2015

Respectfully submitted,

/s/ Thomas Amodio

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*Attorneys for Bristol Bay Regional Seafood  
Development Association and Robert Waldrop*

**CERTIFICATE OF SERVICE**

I certify that on this 8th day of September 2015, I electronically filed a copy of the foregoing **PLAINTIFF'S MOTION TO COMPEL RESPONSES TO THIRD-PARTY SUBPOENAS UNDER FED. R. CIV. P. 45 TO ALASKA CONSERVATION FOUNDATION, SAM SNYDER, BRISTOL BAY REGIONAL SEAFOOD DEVELOPMENT ASSOCIATION, AND ROBERT WALDROP** using the CM/ECF system, which will electronically serve counsel for Defendants **RICHARD L. POMEROY, STUART JUSTIN ROBINSON, BRAD P. ROSENBERG, and ROBIN F. THURSTON**, and counsel for non-party witnesses **JEFFREY M. FELDMAN and CHESTER DEMOTT GILMORE**.

And I certify that a copy of the foregoing was served by regular U.S. mail on:

JOSHUA A. LEVY  
Cunningham Levy LLP  
1250 Connecticut Ave., # 200  
Washington, D.C. 20036

*Counsel for Robert Waldrop and  
Bristol Bay Regional Seafood Development Association*

/s/ Mark F. Murphy  
Mark F. Murphy